



Linda S. Adams Secretary for Environmental Protection

Department of Toxic Substances Control

Maureen F. Gorsen, Director 1011 North Grandview Avenue Glendale, California 91201



August 24, 2006

Mr. Boramy Ith, Environmental Operations Supervisor Southern California Gas Company 8101 South Rosemead Boulevard Pico Rivera, California 90660

Dear Mr. Boramy Ith:

On June 27, July 11, & 21, 2006, the California Environmental Protection Agency, Department of Toxic Substances Control (Department), conducted an inspection of Southern California Gas Company located at 8101 South Rosemead Boulevard, Pico Rivera, California, EPA ID Number CAT 000 625 137. The enclosed report describes the findings of this inspection, including all violations observed and any actions that should be taken by Southern California Gas Company to correct the violations.

All pertinent information derived from the inspection, including documents, photographs, and sampling results, are included as attachments to the report, except copies of documents provided by your facility at the time of the inspection. In order to reduce copying and mailing costs, these have not been returned to you with the report; copies will be provided if you request them. This report will become a public document; you may request that any trade secret or facility security information be withheld from public disclosure. (See Health and Safety Code Section 25173.)

If you have any questions regarding this letter, or if you wish to meet with the Department to discuss any questions or concerns you have with the inspection, the report, or the violations, please call Brian Wu at (818) 551-2838.

Sincerely

Mukul Agarwal, Unit Chief

Statewide Compliance Division

Enclosure

Certified Mail No.: 7005 3110 0002 0075 3073

Returned Receipt Requested

II. CONSENT

Consent to conduct inspection that involves: taking photographs, reviewing and copying records, questioning personnel and inspecting hazardous waste handling areas.

Consent given by:

Mr. Boramy Ith, Environmental Operations Supervisor

III. DOCUMENTS REVIEWED

- a. Manifests, Bills of Lading, LDR's and Exception Reports:
 No violations cited. The facility does not manage LDR waste.
- b. Contingency Plan:
 The contingency plan did not contain evacuation routes, location and description of emergency equipment that would be used in an emergency response.
- Training Plan and Records:

 Job title, job description, and training requirements were not included in the training plan or training records.
- d. Incident Report:
 No Incident has occurred that required the facility to file a report.
- e. Waste Analysis Plan and Records:
 The facility does not have a detail a waste analysis plan, but each hazardous waste has a waste profile.
- f. Operation Log:
 No violations noted.
- g. Inspection Records:
 Weekly inspections were conducted on permitted hazardous waste management units.
- h. Tiered Permitting Applications and Authorization Letters: Not evaluated
- i. Annual/Biennial Reports: No violation noted.
- j. SB 14 Plans: Not evaluated

facility stored several metal baskets of newly received waste. (Attachment 1, photo 1). Mr. Felipe Sanchez, Senior Logistic Representative, told me that the waste just arrived, and the containers would be segregated and stored with like waste streams.

At Unit 5, two buckets were stored in this area and labeled as empty. (Attachment 1, photo 2). Toward the west fence of Unit 5, a drum containing pipeline condensate was marked with an accumulation started date of 3/31/06. (Attachment 1, photo 3). Mr. Goldsberry told me that the condensate is hazardous material that SC Gas sells as by-product.

At the southwest corner of Unit 3 containment, I saw 4 55-gallon and 4 5-gallon drums placed on containment pallets that were marked as non-hazardous waste (Attachment 1, photo 4). Mr. Sanchez told me that the drums contained mercaptan contaminated soil. North of these 8 drums of contaminated waste were 10 55-gallon drums of non-friable asbestos (Attachment 1, photo 5). Neither Mr. Goldsberry nor Mr. Sanchez could provide me with any documentation that characterized the contaminated soil and asbestos as non-hazardous waste.

North at Unit 3, were a roll of 20 55-gallon drums of paint waste and oily water (Attachment 1, photo 6). Next to that roll was another roll of similar waste (Attachment 1, photo 7). By the northwest corner of Unit 3 containment, the facility had stored a roll of non-automobile oil waste. (19 5-gallon & 4 35-gallon drums) (Attachment 1, photo 7).

North of Unit 3 is Unit 4, where non-RCRA hazardous waste was stored I observed that there were 6 55-gallon drums, 2 5-gallon cans of antifreeze and 3 55-gallon drums of waste oil in Unit 4 (Attachment 1, photos 8 & 9). I did not observe any violations in this area. Outside the permitted storage units, I saw three containers that were used to store universal waste. The first container located immediately north of the permitted unit was used for storage of batteries. (Attachment 1, photos 10 & 11). Next to the batteries was a container used for storing used florescent light tubes (Attachment 1, photo 12). West of the permitted units, there were 34 55-gallon drums of used aerosol cans stored inside a container (Attachment 1, photos 13 & 14). I did not conduct a universal waste inspection.

On July 11, 2006, I met Mr. Boramy Ith, the Environmental Operation Supervisor, in his office and acquired his consent to continue the inspection. I inspected the contingency plan and noticed that although evacuation routes were posted in each building, the evacuation route was not included in the plan. In addition, the alternate evacuation routes were also missing. When I reviewed the plan, I also noticed that the list of emergency equipment was incomplete. The location and the description of the capacity of each piece of emergency equipment was not recorded in the plan.

The training records indicated that every employee at the facility had received training on the business plan. In addition, the personnel who handled hazardous waste had received 40-hour Hazwoper training, DOT requirement, etc. However; I observed that the job title, job description, and training requirements were not included in the facility's training plan.

I noticed that SC Gas only conducted internal inspection once a week on its permitted units (Attachment 2). Mr. Ith told me that the facility conducted the inspections according to their operation plan, which was approved under permit 96-SC-S-07 on 10/22/96 by the Department. The waste analysis was conducted according to the same approved operation plan. SC Gas applied generator's knowledge and initial sample analysis to create profiles for each waste stream. The facility did not have any screening record for the hazardous waste received at the site, but they did sample the waste for PCB's and when necessary due to a process change, and new waste streams.

The closure plan was also in the approved operation plan. SC Gas has not changed their operation, but has included universal waste due to regulatory changes. The facility has an adequate closure cost estimate. I also checked the annual/biennial report, the certification for secondary containment for tanks and the air emission requirement. I did not note any violations of those records.

I gave Mr. Ith two lists of manifests that I wanted to review. Mr. Ith told me that the Transportation Department of SC Gas keeps the transporter's copies and he gave lists to Ms. Marty Castillo, who does the filing of the manifests for the facility. Ms. Castillo was able to locate all the manifests I asked for except manifest 24071525. I discovered that the waste on pre-printed manifest 24071525 was actually picked up and shipped to Filter Recycling Services. The waste was not handled by the SC Gas Pico Rivera Facility (Attachment 3).

I asked to inspect the Transportation Department. I inspected the transporter copies of the manifests that SC Gas had transported. I noticed that there were three shipments accompanied by manifests 24175826, 24175860, and 24175509 that were kept in transit for over ten days (Attachment 4). Mr. Ith explained that hazardous waste arrives along with other equipment, such as gas meters and other materials, they are then placed on the Transportation Department dock. After the items are sorted, they then would transfer the hazardous waste to the TSDF. He assumed that this delay is causing them to have hazardous waste in transit for more than ten days.

On July 21, 2006, Ms. Ruth Williams-Morehead and I went back to the facility to complete the inspection. Ms. Williams-Morehead checked the operating records while I was getting the information on the pipeline condensate. Mr. Ith told me that SC Gas sold the non-PCB's condensates to either EMS in Phoenix, Arizona (an incinerator) or Anterra in Oxnard (oil well company). The profiles for the non-

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friable asbestos and mercaptan contaminated soil, Mr. Ith was unable to provide me with the analysis to document that the two waste streams are non-hazardous.

After I reviewed the receiving logs and computer records, Ms. Williams-Morehead was able to track all hazardous waste throughout the facility, but the location of several of the hazardous waste drums were not recorded in the receiving log. (I.e. Unit 3) (Attachment 5). For the import/export activity, Mr. Ith told us that SC Gas did not import or export any hazardous waste; they only accept hazardous waste from other SC Gas sites.

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Summary of Violations attached?

MINOR VIOLATIONS

1. Information in contingency plan was incomplete.

Southern California Gas Company violated Title 22, California Code of Regulations, Section 66264.52 (e) & (f), in that the facility's contingency plan did not include the physical description, capabilities, and the location of the emergency equipment. In addition, the evacuation plan was not properly described.

Evidence:

Observation made by Brian Wu. SC Gas' contingency plan

Correction Action:

On August 16, 2006, SC Gas certified that the above violation has been corrected. No further action is needed.

2. Failure to maintain required training document at the facility

Southern California Gas Company violated California Code of Regulations, title 22, section 66264.16 (d), in that on or about July 11, 2006, Southern California Gas Company failed to maintain the required training document at the facility. For example: the job title for each position related to hazardous waste management, the job description, and training requirement were not described in the training plan.

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Evidence:

Observation made by Brian Wu. SC Gas' training plan and training records.

Corrective Action:

On August 16, 2006, SC Gas certified that the above violation has been corrected. No further action is needed.

3. Operated as a transfer facility without authorization

Southern California Gas Company violated Health and Safety Code section 25202 and title 22, California Code of Regulations, section 66263.18, in that on or about July 11, 2006, the facility operated as a transfer facility by storing hazardous waste in transit for over ten days, to wit: the hazardous waste accompanied by manifests 24175826, 24175860, and 24175509 were not delivered to the designated facility until 14 days later.

Evidence:

Copies of manifests provided by SC Gas

Corrective Action:

During the inspection, Mr. Ith told us that he will train all SC Gas' drivers and make sure that all hazardous waste will be received by the TSDF within ten days.

VI. CONCLUSIONS

On July 21, 2006, I issued Mr. Ith a Summary of Violations to address the deficiencies that we observed during the inspection (Attachment 6). I discussed my observations with Mr. Ith, and gave him 30 days to meet compliance. I did not cite them for having an expired hazardous waste transporter registration since Mr. Ith corrected the violation immediately. On August 16, 2006, the Department received a response package from SC Gas, which certified compliance of minor violations, they also included the additional information I requested on the contaminated soil and non-friable asbestos (Attachment 7). However, the classification of pipeline condensates is still pending and the Department needs more information on how the recipients are using the condensate before we can determine if the facility has committed a violation.

Original Signed by:

Brian C. Wu Hazardous Substances Scientist 8->3-06'

SOUTHERN CALIFORNIA GAS COMPANY

VIOLATIONS FOUND IN EPA INSPECTIONS

MARCH, 1995

CONTINUATION SHEET SUMMARY OF VIOLATIONS

Facility Name: Southern CA Gas, Pico Rivera, Date: March 30, 1995 April 3, 1995

Section I MINOR VIOLATIONS

Within five working days of achieving compliance, you are required to sign the certification below, and return it to the Department at the above address.

Failure to correct the violations and certify compliance within the time provided may result in the Department taking additional enforcement action for these violations.

- (4) Title 22, CCR Section 66265.16 (a)(3), (c) (d) (e). ISD permit section(6) (a)(1) (b) (d)(e). SCG-PR did not have all the required training documentation considered training descriptions, on the
- Kainings basic emergency response on site, procedures For inspecting emergency and monthsping equipment, communications and alarms on and other items and in above section 66265 were not maintained in the on site training records.
 - (5) Title 22, (CR, Section 66265-52(1), ISD permit section (13)(1) and (1).

 SCG-PR's Contingency Plan 1:1 addresses and phone numbers (Home undwork) of all persons qualified to 4st as emergency coordinators.

I certify under penalty of law that the above corrective actions have been taken and the violations have been corrected. I am aware that there are significant penalties for submitting false information.

Signed			 Date			
				, .		
Title			 •			

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INSPECTION REPORT

GENERAL INFORMATION]..

Company Name:

Southern California Gas Company-Pico Rivera

(SCGC-PR)..

Facility Address:

8101 South Rosemead Boulevard

Pico Rivera, CA, 90660

Telephone Number: (562) 806-4361

Facility Type:

Storage of Hazardous Waste and

Transporter/Transfer facility.

Regulated Units:

Trucks, Containers, and Drums...

Waste Streams:

Used oil, Waste paint, contaminated soil and a variety

of RCRA and non-RCRA waste.

Regulatory Status:

Operates as hazardous waste storage facility. SCGC

also hold a transporter registration. Hazardous

Waste Transporter Registration #1648.

Inspected by:

Julio Narvaez

Date of Inspection: January 24 and 31, 2000

Type of Inspection: CEI ⊠

CME -

Focused □ Limited ⊠

Facility Rep.:

J.J. Silva Environmental Operations/ Resource Recovery Team Leader and Brandon L. Vossler,

Service Center Environmental Compliance

Specialist.

Type of Business:

Natural Gas utility company.

II. CONSENT

Consent to conduct inspection that involves: taking photographs, reviewing and copying records, questioning personnel and inspecting hazardous waste handling areas.

Consent given by : J.J. Silva.

Facility: Southern

DEPARTMENT OF HEALTH SERVICES

107 SOUTH BROADWAY, ROOM 7128 LOS ANGELES, CA 90012. (213) 620-2380

NOTICE OF VIOLATION AND DIRECTIVE TO COMPLY

EPA ID Number:

Inspection Date:



	8/01 ROSEM	EAD BIVD
•	PICO RIVERA	CA
On the above date an i under authority of Sec 66328, California Admi You are directed to co	tion 25185, Cali: nistrative Code.	r Hazardous Waste Facility was conducted fornia Health and Safety Code and Section ions noted below:
5cb) (1)	Written To	coection schedule Not
265.15 (b)	maintained	reportion schedule Not
265.52	Written Co	ntimbiency plan not
,	Completed 11	i 13(c), 13(d), 13(c) Areas
	M ISD	
.(En	resquiry Equip	mont & Evacution plan not address in
IV-3 265.75	Annua	mont & Evacution plan not address in Report not proposed submit
-	To DOHS	yel
I-10,712		
26532(A) NO	o Softey So	fety showers & Eyewashes to storage Area.
111	. Haz. Was	to Storage Area.
Facility Representativ		Authorized State Agent:
taul D. Looch	2	Original Signed by: Hossein Nassiri
(signature)		(signature)
HAUL D. Grodso	n	Original signed by: Hossein Nassiri
Environmental Af	2 inc	(name)
(title) Id a Direction	tan	(date)
MON (NISTIN	.,, ., ,	

Refer to:			Compliance:				
1SD	40 CFR		Yes	No	N/A	Cmt #	
5(b)(4)	265.15(b) (3)	Does the schedule identify the problem areas to be checked?	·	-			
		PERSONNEL TRAINING					
6(a)(l)	265.16 (1)	Does the owner/operator provide classroom or on the job training to facility personnel?	/	·			
6(a)(2)	265.16(a) (2)	Are instructors trained in hazardous waste management procedures?	/				
		Does training include:	_				
6(a)(3)	265.16(3)	Emergency response including use of emergency equipment and systems?	/				
6 (b)	265.16(b)	Has current personnel completed training?	•				
6(c)	265.16(c)	Is an annual training review conducted?					
		Does the owner/operation maintain following documents and records at the facility:					
6(d)(1)	265.16(d)	Job Title for each position at the facility reltated to HWM?	-				
6 (d) (2)	265.16(d) (2)	Written job description for each position listed above?	/				
6(d)(3)	265.16(d) (3)	Written records of the type and amount of introductory and continuing training?	/				
		CONTINGENCY PLAN					
12(a)	265.51	Does the facility have a contingency plan?	/				
13(a)	265.52(a)	Does the contingency plan describe personnel responsibilities and action to be taken in the event of fire, explosion or release		·			
		of hazardous waste?					
13(c)	265.52(c)	Does the plan describe agreements with police, fire departments, hospitals, contractors and State and local emergency response team	s?				
13 (d)	265.52(d)	Does the plan list names, addresses and phone numbers for all emergency coordinators?		/			
13(e)	265.52(e)	Does the plan list all emergency equipment available at the facility along with its location and capabilities?			·		

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